

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**TQ DELTA, LLC,
Plaintiff,**

v.

**JURY TRIAL DEMANDED
(FILED UNDER SEAL)**

**COMMSCOPE HOLDING COMPANY,
INC., COMMSCOPE INC., ARRIS
INTERNATIONAL LIMITED, ARRIS
GLOBAL LTD., ARRIS US HOLDINGS,
INC., ARRIS SOLUTIONS, INC., ARRIS
TECHNOLOGY, INC., and ARRIS
ENTERPRISES, LLC,**

**Civil Action 2:21-cv-310-JRG
(Lead Case)**

**NOKIA CORP., NOKIA SOLUTIONS
AND NETWORKS OY, and NOKIA OF
AMERICA CORP.**

**Civil Action No. 2:21-cv-309-JRG
(Member Case)**

Defendants.

**TQ DELTA’S SECOND UNOPPOSED MOTION FOR EXTENSION OF TIME TO
RESPOND TO THE COMMSCOPE DEFENDANTS’ MOTION TO TRANSFER VENUE
TO THE DISTRICT OF DELAWARE**

Now comes Plaintiff TQ Delta, LLC (“TQ Delta”) and respectfully moves for an extension of time to respond to Defendants CommScope Holding Company, Inc., CommScope Inc., ARRIS US Holdings, Inc., ARRIS Solutions, Inc., ARRIS Technology, Inc., and ARRIS Enterprises, LLC’s (“CommScope”) Motion to Transfer Venue to the District of Delaware (“Motion”). Dkt. No. 32. Specifically, TQ Delta requests that its response deadline be extended to two weeks after the completion of its venue discovery.

On November 18, 2021, TQ Delta filed its first unopposed motion for an extension of time to respond to CommScope’s Motion to Transfer Venue, which has yet to be ruled on by the Court. Dkt. No. 38. After the filing of this motion, the parties conferred on the issue of conducting venue

discovery, which resulted in the following agreement: By December 3, 2021 TQ Delta will serve on CommScope a notice under Federal Rule of Civil Procedure 30(b)(6) that contains no more than ten (10) topics and the resulting deposition will last for no longer than four (4) hours. Further, TQ Delta will serve no more than five (5) interrogatories and no more than five (5) requests for document production. The parties also agreed that, after the filing of TQ Delta's Response, CommScope would be permitted to conduct venue discovery to the same extent as that specified in the two preceding sentences. The parties anticipate on conferring after the filing of TQ Delta's Response in order to coordinate the timing of CommScope's venue discovery and will move to extend the deadline for CommScope's Reply to allow for that discovery.

Plaintiff TQ Delta respectfully requests that the Court extend the deadline for it to respond to CommScope's Motion so that TQ Delta's deadline to respond will be placed two weeks after the completion of the its venue discovery.

Dated: November 29, 2021

Respectfully submitted,

By: /s/ William E. Davis, III
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ATTORNEYS FOR PLAINTIFF
TQ DELTA, LLC

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document is being filed electronically in compliance with Local Rule CV-5(a). As such, this document is being served this November 29, 2021, on all counsel of record, each of whom is deemed to have consented to electronic service. L.R. CV-5(a)(3)(A).

/s/ William E. Davis, III
William E. Davis, III

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel have complied with the meet-and-confer requirements of Local Rule CV-7(h) and (i) and that CommScope Defendants are unopposed to this motion.

/s/ William E. Davis, III
William E. Davis, III